

REMARKS FOR PRE-APPEAL BRIEF REQUEST FOR REVIEW IN U.S. PATENT
APPLICATION NO. 10/727,199 FILED ON 12/2/2003

In the Final Office Action, the Examiner rejected claims 1, 5-8, 10-13, 15-17, 19, 27, 29, 30, 38, 46 and 48 under 35 USC § 103(a) in view of various combinations of Nakagawa (2004/0095314), Spletzer (6,919,909), Lechner (5,487,665), and Dugdale (5,707,128). These rejections now are traversed.

Claims 1, 27, 29, 30, 38, 46, and 48 recite display systems and methods for *displaying a display image* corresponding to *a source image*, in which user input *changing the source image* affects a *change in the display image*. These aspects of the claimed invention are not disclosed or suggested by the cited references considered alone or in the combination proposed by the Examiner, for the reasons articulated on pp. 19-23 of Amendment C filed 11/29/07 (“Amd C”).

The Examiner indicates in the Final Office Action dated 12/26/07 (“FOA” herein) that he *agrees with* Applicants’ statements that Spletzer, and Lechner do not disclose or suggest displaying a portion(s) of a display image corresponding to a portion/window of the source image (p. 2, 2nd ¶ of item 2.; p. 3, 1st ¶, middle of page), but that the Examiner did not use these references for this purpose. FOA at p. 2-3, item 2. Applicants disagree with the Examiner’s purpose statement, and direct the Examiner’s attention to FOA p. 7, ¶4 (and Office Action dated 6/29/07 (“NFOA”), p. 4-5), in which the Examiner uses Spletzer, and to FOA p. 8, ¶4, in which the Examiner uses Lechner, each to show *precisely* this limitation of the claims. Thus, since the Examiner now admits that Spletzer and Lechner do not show these elements, this aspect of the proposed combination is deficient to show the above-stated limitations. Thus, the Examiner has failed to meet his prima facie burden of showing this limitation in the references.

The Examiner then points to Nakagawa. FIGS. 9A-B, 10 and [0072] to show “a source image for receiving user input to affect changes to a display image.” FOA, p. 4, 1st ¶. However, it is clear from these figures and description that Nakagawa shows user changes to only a *display* image. The user input to affect a change at the display image is received at the display image, not at a **source image** as claimed. Thus, Nakagawa does not show at least this element.

Thus Applicants affirm that they can find nowhere in Nakagawa, Spletzer, Lechner, or Dugdale, considered alone or in the combination proposed by the Examiner, any disclosure or

suggestion of a *source image* for *receiving user input to affect changes* (movement, size, etc.) to a *display image*, and that the Examiner's admissions discussed above also indicate that the suggested combination is deficient. *Contrary* to the Examiner's assertions that Applicants have attacked the references individually, Applicants have shown that none of the references, individually or in the suggested combinations, show the claimed limitations, and thus the Examiner has not met his prima facie burden of proof.

In addition, Applicants note that the Examiner's rejection of the claims on several occasions uses language that does not reflect the current state of these claims. Examples can be found at FOA p. 3, ll. 13-16; p. 7, 4th ¶; and p. 8, 4th ¶. Thus, even assuming *arguendo* that the references show exactly what the Examiner asserts that they do, the Examiner has not even asserted that the references show the currently **claimed** limitations.

Thus, Applicants again submit that claims 1, 27, 29, 30, 38, 46, and 48 are patentably distinguishable over the cited references, as are dependent claims 5-8, 10-13, 15-17, 19, 34-37, 39, 40, and 42-44. Independent claims 4, 22, 25, and 47, as amended, also recite limitations similar to those discussed above, as well as additional limitations discussed below.

In the Office Action, the Examiner rejects claims 4, 9, 20, 30, 33, 34-37, 39, 40, and 42-44 under 35 USC § 103(a) in view of various combinations of Nakagawa, Spletzer, and Lechner. These rejections now are traversed.

Claims 4 and 30 respectively recite a display system and method for displaying a **display image** including a first portion corresponding to a first window **of a source image** and a second portion **of the display image** corresponding to a second window **in the source image**, in which *user input to the source image* changes the active window from the first window to the second window. The suggested combination of Nakagawa, Spletzer, and Lechner has deficiencies beyond those articulated above, as articulated on pp. 23-26 of Amd C.

The Examiner indicates that Nakagawa shows two windows, and Spletzer shows an image subset in higher resolution deserving specific attention, and when combined "the window [that is] active [] is something that deserves more specific attention since the user is typically looking at the window that is active...the active window will be the portion *of the display* projected in higher resolution." FOA at p. 4-5 (emphasis added). Applicants submit that the Examiner's logic is faulty on several accounts. First, as claimed, the active window is a window **in the source image**, not a "portion of the **display**" image. Thus, even assuming *arguendo* that

the references show an active window in the display image, the Examiner has not shown the claimed limitation. Second, as claimed, the user input changes the **source image**; as discussed above, Nakagawa does not disclose any changes to a source image. Third, the Examiner points to no aspects of the references that correspond to the control mechanism element of claims 4 and 30, which differs from the control mechanism of claim 1. Thus the Examiner has not met his prima facie burden. In fact, the Examiner rejects claim 30 “on the rationale” of claim 1, despite claim 30 having substantial substantive differences from claim 1, which are not discussed by the Examiner. Thus, none of the references, individually or in the suggested combinations, show the claimed limitations of claims 4 and 30.

In addition, the Examiner again rejects the claims using language that does not reflect the current state of the claims at FOA p. 9, 2nd ¶. Thus, even assuming *arguendo* that the references show exactly what the Examiner asserts, they do not show the currently **claimed** limitations.

Thus, Applicants again submit that claims 4 and 30 are patentably distinguishable over the cited references, as are dependent claims 34-37, 39, 40, and 42-44.

In the Office Action, the Examiner rejects claims 22, 24, 25, and 47 under 35 USC § 103(a) in view of various combinations of Nakagawa, Spletzer, Lechner, Fisher (5,326,266), and Dugdale. Claims 49 also is newly rejected in view of these references and new reference Surati (6,456,339). These rejections now are traversed.

As an initial matter, claims 22, 25, 47, and 49 are patentably distinguishable over Nakagawa, Spletzer, Lechner, and Dugdale for the reasons articulated above. Fisher does not remedy the above-stated deficiencies of Nakagawa, Spletzer, and Lechner, nor does the Examiner argue that it does.

Claims 22, 25, and 47 recite display systems for displaying an image including a **seamless** second portion of the display image **collectively displayed using multiple workspace projectors**.

The Examiner alleges that Applicants failed “to explicitly point out the problems with previously rejected claim 24 which recited this feature.” FOA at p. 5, 2nd ¶. The Examiner’s assertion is erroneous for two reasons. First, claim 24 (now cancelled) was a dependent claim that previously recited “wherein *the window projector* displays *the first portion* of the image *without any visible seams*.” In contrast, current claims 22, 25, and 47 recite “**a plurality of workspace projectors**, for **collectively displaying** a second portion of the display image

comprising a blank area...wherein no seam is visible **in the blank area collectively displayed by the plurality of workspace projectors**. Thus, claims 22, 25, and 47 recite different features than prior claim 24. Applicants submit that the Examiner's misunderstanding of these limitations stems from yet another example of the Examiner's rejection of the claims that uses language that does not reflect the current state of the claims at FOA p. 16, 2nd and 3rd ¶¶. Second, Applicants submit that they did point out the problems with the rejection of prior claim 24, and point the Examiner to Amd C, p. 27-30, see especially discussion of Fisher on p. 29, as the Examiner focuses on Fisher in his Response to Arguments at FOA p. 5.

Briefly, Fisher recites only the ability to blend the "transition" between *inset* and *background* images. Fisher does not disclose or suggest combining **a display image portion (the blank) collectively displayed using multiple projectors** such that **the blank** itself has no seams; it discloses at best no seam between first and second portions. Please see Amd C, p. 27-30 regarding the other cited references.

The Examiner argues that Fisher was "used only to teach that there is no seam." FOA at p. 5, 2nd ¶. However, the Examiner admits that Nakagawa, Spletzer, and Lechner fail to teach that the window projector displays the portion without any visible seams. Thus, showing "only...that there is no seam" (as the Examiner indicates he is using Fisher), the Examiner has not met his burden with respect to the remainder of this element. New reference Surati does not remedy the above-stated deficiencies, nor does the Examiner allege that it does.

Thus, Applicants submit that claims 22, 25, and 47, and dependent claim 49, are patentably distinguishable over the cited references, considered alone or in the combination suggested by the Examiner.

Therefore, it is requested that the final rejections of independent claims 1, 4, 22, 25, 27, 29, 30, 38, and 46-48, and their dependent claims 5-8, 10-12, 15-17, 19, 34-40, 42-44, and 49 be withdrawn.

Respectfully submitted,

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